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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 VANESSA NELSON

Case No. 2:24-cv-00419-ART-BNW

13 Plaintiff,

14 vs.

15 WOOD RESIDENTIAL, LLC; WOOD
16 PARTNERS, LLC; WOOD REAL ESTATE
17 INVESTORS, LLC; and DOES 1-50,
inclusive,

18 Defendants.

**JOINT STATUS REPORT AND
STIPULATION TO STAY ALL CASE
DEADLINES FOR 30 DAYS**

[Second Request]

19 The Parties, Plaintiff Vanessa Nelson, through her counsel, Rafii & Associates, P.C., and
20 Defendants Wood Residential, LLC (“Wood Residential”), Wood Real Estate Investors, LLC
21 (“WREI”), and Wood Partners, LLC (“Wood Partners”), through their counsel, the Jackson Lewis,
22 P.C., submit the following Joint Status Report:

23 1. On March 19, 2024, the Parties filed a Stipulation to Stay All Case Deadlines for 30
24 Days while the Parties explored early resolution of this case through alternative dispute resolution
25 processes. ECF. 13. The Parties also entered into a separate agreement to toll the statute of
26 limitations on Plaintiff’s claims, including the putative class and collective claims, until such time
27 as Defendants file their Answer to the Amended Complaint.

1 2. The Stipulation provided that if the Parties did not reach a resolution during the 30
2 days, the Parties would file a joint status report by April 22, 2024, informing the Court whether a
3 resolution was reached. As counsel for Plaintiff was out of the office ill, the Parties were unable
4 to complete the joint status report until today, April 24, 2024.

5 3. The parties have been working diligently to explore resolution. However, due to
6 Plaintiff's Counsel's absence from the office because of an illness the past two weeks, and also due
7 to Defense Counsel's increased workload after an attorney on her team suffered a medical
8 emergency and was hospitalized without warning in March, the Parties negotiations were
9 unexpectedly interrupted and delayed preventing the parties from completing negotiations during
10 the 30 days. However, the Parties are continuing to work diligently to explore resolution prior to
11 the Early Neutral Evaluation Conference scheduled on May 15, 2024.

12 4. The Parties desire to avoid the time and expense of imminent discovery deadlines,
13 including conducting the FRCP 26f initial case conference, commencing discovery and making
14 initial disclosures, as well as Defendants deadline to file a response to the Amended Complaint,
15 while exploring resolution and prior to the Early Neutral Evaluation Conference (ENE).

16 5. Accordingly, except for the ENE on May 15, 2024, the Parties have agreed to stay
17 all case deadlines and discovery for an additional thirty (30) days, through May 24, 2024, to
18 conserve the Parties' respective resources and for the sake of judicial economy while the Parties
19 continue to explore resolution and if they have not reached a resolution prior to May 15 to attend
20 the ENE.

21 6. If the Parties have not reached a resolution prior to or at the ENE on May 15, 2024,
22 the Parties will file a joint status report by May 24, 2024, informing the Court whether a resolution
23 was reached.

24 7. Further, if the case does not resolve by May 15, 2024, then: (a) Defendants' response
25 to Plaintiff's Amended Complaint shall be due by May 31, 2024; and (b) the Parties' [Proposed]
26 Discovery Plan and Scheduling Order shall be due by May 31, 2024.

27 8. The parties agree that they are not waiving, relinquishing, or otherwise impairing
28 any claim, defense, argument, or other right they may have by virtue of filing this Joint Status

1 Report or participating in early resolution processes.

2 9. This request is made in good faith and not for the purpose of delay.

3 10. This is the second request for a stay of discovery and all pending deadlines to explore
4 resolution through alternative dispute resolution processes, except for the ENE Conference
5 scheduled on May 15, 2024.

6 Dated this 24th day of April, 2024.

7 RAFII & ASSOCIATES, P.C.

JACKSON LEWIS P.C.

8 /s/ Jason Kuller

9 Jason Kuller, Esq., Bar No. 1224
Shay Digenan, Esq., Bar No. 16397
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/s/ Deverie J. Christensen

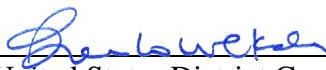
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13 **ORDER**

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15 IT IS SO ORDERED:

16 
17 United States District Court Judge /
United States Magistrate Judge
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19 Dated: 4/26/2024

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